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The parties' request for an extension is GRANTED.
Fact discovery shall be extended through February
25, 2025. The March 26, 2025 conference shall be
adjourned until April 2, 2025 at 11:00 a.m.

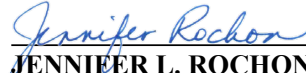
Dated: February 3, 2025

SO ORDERED.

January 31, 2025

New York, New York

Honorable Jennifer L. Rochon
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007


JENNIFER L. ROCHON
United States District Judge

Re: Fein v. City of New York, et al., 23-cv-5306 (JLR) – Joint Letter Motion for
Extension of Fact Discovery and Adjournment of Case Management Conference

Dear Judge Rochon:

The parties submit this joint letter motion requesting an extension of fact discovery through February 25, 2025 and an adjournment of the court conference scheduled for March 26, 2025. This is the fourth joint request for an extension or adjournment, and the Court has granted each request.

Currently, fact discovery is scheduled to end on February 3, 2025 and expert discovery is scheduled to end on February 25, 2025. Both parties would like to take fact witness depositions in addition to expert witness depositions between February 3 and February 25. The parties have been unable to schedule several fact witness depositions prior to February 3 due to scheduling conflicts and one witness being on leave from work due to health issues. Please note that the parties do not wish to change the discovery cut-off date of February 25, 2025. A revised Civil Case Management Plan and Scheduling Order is attached as Exhibit A.

In addition, there is currently a Case Management Conference scheduled for March 26, 2025 at 11:00 a.m. The parties would like to request that the conference be adjourned to March 31, April 2, or April 4 at the same time (11:00 a.m.), or on whatever day is most convenient for the Court. The law students who have been admitted to this litigation (see ECF Nos. 65) will be on spring break during that week, and Plaintiff's attorney Lee Bantle will be out of town that

week as well.

We thank the Court for its attention to this matter.

Dated: January 31, 2025
New York, New York

Respectfully submitted,

BANTLE & LEVY LLP

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